

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>IN RE:</b>	§	
	§	<b>CASE NO. 08-35653-krh</b>
<b>CIRCUIT CITY STORES, INC.,</b>	§	<b>(Chapter 11)</b>
<b>ET AL.,</b>	§	<b>(Jointly Administrered)</b>
	§	
<b>Debtors.</b>	§	

**NOTICE REGARDING VERIFIED MOTION TO RECONSIDER (A) ORDER  
DENYING MOTION OF RYAN, INC. F/K/A RYAN & COMPANY, INC. TO COMPEL  
DEBTOR TO ASSUME EXECUTORY CONTRACT AND (B) ORDER PURSUANT  
TO BANKRUPTCY CODE SECTIONS 105(A) AND 365(A) AND  
BANKRUPTCY RULE 6006 AUTHORIZING REJECTION OF  
CERTAIN EXECUTORY CONTRACT WITH RYAN, INC.**

PLEASE TAKE NOTICE that Ryan Inc. f/k/a Ryan & Company, Inc. (“**Ryan**”), by and through the undersigned counsel, pursuant to 11 U.S.C. sec 365(d)(2) and Fed. R. Bankr. P. 6006(b) and 9014, has filed papers (specifically that certain *Verified Motion to Reconsider (A) Order Denying Motion of Ryan, Inc. f/k/a Ryan & Company, Inc to Compel Debtor to Assume Executory Contract and (B) Order Pursuant to Bankruptcy Code Sections 105(A) and 365(A) and Bankruptcy Rule 6006 Authorizing Rejection of Certain Executory Contract with Ryan, Inc.* (the “**Motion**”)) requesting the entry of an Order granting Reconsideration of the above referenced Orders. A copy of the Motion and proposed Order is being served with this Notice.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion is scheduled for April 29, 2010 at 10:00 a.m. prevailing Eastern Time, before the Honorable Kevin R. Huennekens, United State Bankruptcy Judge for the United States Bankruptcy Court for the Eastern District of Virginia, 701 East Broad Street, Courtroom 5000, Richmond, Virginia 23219.

**PLEASE TAKE FURTHER NOTICE THAT your rights may be affected. You should read these papers and carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

Bruce W. Akerly, Esq.  
Texas Bar No. 00953200  
Cantey Hanger LLP  
1999 Bryan Street, Suite 3330  
Dallas, Texas 75201  
(214) 978-4129 Telephone  
(214) 978-4150 Facsimile

ATTORNEYS FOR RYAN, INC.  
F/K/A RYAN & COMPANY, INC.

Robert M. Marino, Esq.  
VSB #26076  
REDMON PEYTON & BRASWELL LLP  
510 King Street, Suite 301  
Alexandria, Virginia 22314  
(703) 684-2000 Telephone  
(703) 684-5109 Facsimile

LOCAL ATTORNEYS FOR RYAN, INC.  
F/K/A RYAN & COMPANY, INC.

PLEASE TAKE FURTHER NOTICE THAT any objection to the filed Motion must be made in writing, filed with the Bankruptcy Court at the following address: Clerk of the United States Bankruptcy Court, 701 East Broad Street, Suite 4000, Richmond, Virginia 23219, and served so as to be received no later than 11:59 p.m. prevailing Eastern Time on April 22, 2010 (the "Objection Deadline") by the following persons: (i) Bruce W. Akerly, Esq., Cantey Hanger LLP, 1999 Bryan Street, Suite 3330, Dallas, Texas 75201; (ii) Robert M. Marino, Esq., Redmon Peyton & Braswell, LLP, 510 King Street, Suite 301, Alexandria, Virginia 22314; (iii) Douglas M. Foley, Esq., McGuireWoods LLP, 9000 World Trade Center, 101 W. Main St., Norfolk, Virginia 23510; (iv) Dion W. Hayes, Esq., McGuireWoods LLP One James Center, 901 E. Cary St., Richmond, Virginia 23219; (v) Gregg Galadi, Esq., Skadden Arps, Slate Meagher & Flom LLP, One Rodney Square, Box 636, Wilmington, Delaware 19899; (vi) Robert Van Arsdale, Esq., Office of the United States Trustee, 701 East Broad Street, Suite 4304, Richmond, Virginia 23219; (vii) Lynn L. Tavenner, Esq., Tavenner & Beran PLC, 20 North Eighth Street, Second Floor, Richmond, Virginia 23219; (viii) Jeffery N. Pomerantz, Esq., Brad R. Godshall, Esq., Pachulski Stang Ziehl & Jones, LLP, 10100 Santa Monica Blvd., 11<sup>th</sup> Floor, Los Angeles, California 90067-4100; (ix) John D. Fiero, Esq., Pachulski Stang Ziehl & Jones, LLP, 150 California Street, 15<sup>th</sup> Floor, San Francisco, California 94111-4500; and (x) Robert J. Feinstein, Esq., Pachulski Stang Ziehl & Jones, LLP, 780 Third Ave., 36<sup>th</sup> Floor, New York New York 10017. Unless a written response is filed and served before the Objection Deadline, the Court may deem the opposition waived, treat relief under the Motion as conceded, and issue an order granting the requested relief. If you mail your response to the Bankruptcy Court, you must mail it early enough so that the Bankruptcy Court will receive it on or before the expiration of the Motion Objection Deadline.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: March 25, 2010

Respectfully submitted

/s/ Robert M. Marino

---

Robert M. Marino, Esq.  
VSB #26076  
REDMON PEYTON & BRASWELL LLP  
510 King Street, Suite 301  
Alexandria, Virginia 22314  
(703) 684-2000 Telephone  
(703) 684-5109 Facsimile

and

/s/ Bruce W. Akerly

---

Bruce W. Akerly  
CANTEY HANGER LLP  
1999 Bryan Street, Suite 3330  
Dallas, Texas 75201  
Phone: 214-978-4129  
Fax: 214-978-4150  
Email: [bakerly@canteyhanger.com](mailto:bakerly@canteyhanger.com)

Attorneys for Ryan, Inc. f/k/a Ryan & Company, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing proposed Order was served electronically through the ECF System on March 25, 2010, upon all persons, entities and parties-in-interest who have entered their appearance and requested to receive notice in this case.

/s/ Robert M. Marino

---